

# Exhibit A

DRAFT

STEPHANIE M. HINDS (CABN 154284)  
United States Attorney

THOMAS A. COLTHURST (CABN 99493)  
Chief, Criminal Division

ADAM A. REEVES (NYBN 2363877)  
ROBERT S. LEACH (CABN 196191)  
Assistant United States Attorneys

1301 Clay Street, Suite 340S  
Oakland, California 94612  
Telephone: (510) 637-3680  
Fax: (510) 637-3724  
Email: adam.reeves@usdoj.gov

Attorneys for United States of America

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No. 18-CR-577 CRB
	)	
Plaintiff,	)	THE UNITED STATES' BILL OF PARTICULARS
	)	
v.	)	
	)	
MICHAEL RICHARD LYNCH and	)	
STEPHEN KEITH CHAMBERLAIN,	)	
	)	
Defendants.	)	

---

Without conceding that it is necessary pursuant to Fed. R. Crim. P. 7, and to avoid any claims of surprise or prejudice, the United States hereby offers this bill of particulars as to Count Seventeen of the First Superseding Indictment as to defendant Stephen Chamberlain only.

1. The offenses in Paragraph 32 that defendant Chamberlain is alleged to have conspired to commit are (a) circumventing a system of internal accounting controls of an issuer of securities registered under Section 12 of the Securities Exchange Act of 1934, in violation of 15 U.S.C. § 78m; (b) tampering with witnesses, victims, and informants, in violation of Title 18, United States Code, Section 1512; and (c) obstructing proceedings before departments, agencies, and committees, in violation of Title 18, United States Code, Section 1505.

2. As alleged in Paragraph 33, defendant Chamberlain furthered the objectives of the

DRAFT

conspiracy to, among other things, cover up, conceal, influence witnesses, and otherwise obstruct investigations of the scheme to defraud set forth in Paragraphs 19 through 24 by (a) falsifying, destroying, and stealing business records of HP; (b) altering, destroying, mutilating, and concealing records, documents, and objects with intent to impair their integrity and availability for use in official proceedings; and (c) otherwise obstructing, influencing, and impeding official proceedings.

3. The overt acts alleged in Paragraph 34 relating to defendant Chamberlain are Paragraph 34(e) (“On or about February 3, 2012, CHAMBERLAIN and Hussain directed an HP finance employee to falsely record approximately \$5.5 million in revenue to be included in HP’s financial statements for the period ending January 31, 2012.”); Paragraph 34(h) (“In or about May 2012, a co-conspirator instructed an HP employee to erase CHAMBERLAIN’s laptop computer and any backup.”); and Paragraph 34(k) (“On or about July 6, 2012, LYNCH caused the incorporation of ICP London Limited (“Invoke”) in the British Virgin Islands. LYNCH used Invoke and entities affiliated with Invoke as a means to pay former Autonomy employees, including Hussain.”).

Pursuant to Fed. R. Crim. P. 7(f), the United States reserves the right to amend, revise, and supplement this bill of particulars as to defendant Chamberlain as justice requires or for good cause shown.

DATED: June \_\_, 2022

STEPHANIE M. HINDS  
United States Attorney

*/s/ Adam A. Reeves*

---

ADAM A. REEVES  
ROBERT S. LEACH  
Assistant United States Attorneys